

Exhibit 51

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1 executives?

2 A No. No.

3 I said, "It's a good opportunity."

4 Not --

5 Q It's a good opportunity?

6 A Yes. Yes.

7 Q Then is the consultation provision of
8 the agreement also a good opportunity?

9 A It was the decision, between
10 Mr. Gallo and the company, to have this kind of
11 agreement.

12 Q Now, during the one year that you
13 were stationed in New York, from 2003 to 2004,
14 what did you observe about the relationship
15 between Mr. Gallo and Mr. Libutti?

16 A They were discussing, issuing on any
17 day. They were quite the good cooperation.

18 Q Did you notice any conflict/dispute
19 between Gallo and Libutti?

20 A No.

21 Q Was there ever any complaints
22 reported to you, either by Mr. Gallo against
23 Mr. Libutti or Mr. Libutti against Mr. Gallo?

24 A Just one.

25 Q What was that?

1 THE WITNESS: N-I-E --

2 MR. KORAL: -- L-S.

3 MR. AKIN: Right.

4 That's what I thought.

5 The last name, Wulf, W-U-L-F?

6 THE WITNESS: W-U-L-F-F.

7 MR. AKIN: "Double 'F'."

8 BY MR. AKIN:

9 Q Who is Niels Wulff?

10 A Who is?

11 Q Yes?

12 A He was an executive of the company.

13 Q What was the title?

14 A When?

15 Q From 2003 until 2006.

16 A I think he left the company in 2003.

17 Q What month in 2003?

18 A I don't remember.

19 Q What was his title when he left the
20 company?

21 A He was responsible for North America
22 sales.

23 Q And why did he leave the company?

24 A Sorry. Can you --

25 Q Why did he leave the company?

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1 A That Mr. Gallo, I think, at the end
2 of 2003, told me that received rumors from
3 Rome, that Mr. Libutti had some problems with
4 him.

5 Q And what were those problems?

6 A Problems. It was not on the same
7 ideas or there were exchange of ideas. The
8 word I remember was "problems."

9 Q Did you, at any point in time, speak
10 to Mr. Libutti about this matter?

11 A I first asked Mr. Gallo to tell me,
12 where in Rome, who were saying these kinds of
13 things.

14 He said, "No, no. It's not important."

15 And then I told Mr. Libutti, that
16 Mr. Gallo told me like this.

17 And he said, "That was not the case."

18 Q Did you witness any shouting,
19 yelling, screaming between Mr. Libutti and
20 Mr. Gallo?

21 A No.

22 Q Who is Niels Wulff?

23 MR. KORAL: The name is "Nils."

24 Q N-I-E-L-S?

25 MR. KORAL: N-I-L-S.

1 A He found an agreement with the
2 company to leave.

3 Q A similar agreement to what Mr. Gallo
4 was offered?

5 MR. KORAL: Objection.

6 THE WITNESS: I don't know if it's
7 similar or not. But it's an agreement
8 between him and the company.

9 BY MR. AKIN:

10 Q Did Mr. Wulff ever work with
11 Mr. Gallo?

12 A When you mean "work" --

13 Q Did they work together?

14 A Yes.

15 Q Was he a senior to Mr. Gallo?

16 A When he was in New York, no.
17 I don't remember before.

18 Q When they were in New York, was
19 Mr. Wulff a subordinate to Mr. Gallo?

20 A What is?

21 Q Was he beneath Mr. Gallo?

22 A He was a peer.

23 Q Did Mr. Gallo ever make any
24 complaints to you about Mr. Wulff?

25 A Yes. Yes.